

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

IpLEARN, LLC,

Plaintiff,

v.

WBT SYSTEMS, LTD., *et al.*,

Defendants.

Civil Action No. 11-825-LPS

DEMAND FOR JURY TRIAL

**IpLEARN, LLC'S ANSWER TO DEFENDANT LAWSON SOFTWARE INC.'S
COUNTERCLAIM**

Plaintiff and Cross-Defendant IpLearn, LLC ("IpLearn"), by and through its undersigned attorneys, answers the Counterclaim of Defendant Lawson Software Inc. ("Lawson") by corresponding paragraph number as follows:

1. IpLearn realleges and incorporates the allegations in its First Amended Complaint for Patent Infringement as if fully set forth herein.

NATURE OF ACTION

2. Admitted that Lawson purports to assert a claim arising under the Federal Declaratory Judgments Act, 28 U.S.C. §§ 2201 and 2202, for a declaration pursuant to the patent laws of the United States, Title 35, United States Code.

3. Admitted that Lawson purports to seek a declaratory judgment that (1) Lawson does not and has not infringed and in any way, any valid claim of the '556 patent; and (2) the '556 patent is invalid.

PARTIES

4. Admitted.

5. Admitted.

JURISDICTION AND VENUE

6. Admitted.

7. Admitted.

8. Admitted.

COUNT I

(Declaratory Judgment of Non-Infringement and Invalidity of the '556 Patent)

9. IpLearn incorporates its response to paragraphs 1-8 of Lawson's Counterclaim as if fully set forth herein.

10. Admitted.

11. Admitted.

12. Denied.

13. Denied.

14. Denied.

15. Admitted that Lawson purports to request a judicial declaration that it has not and does not infringe, in any way, any valid claim of the '556 patent, and that the '556 patent is invalid.

PRAYER FOR RELIEF

WHEREFORE, IpLearn prays for the following relief with regard to Lawson's counterclaim:

- A. A dismissal with prejudice of Lawson's counterclaim;
- B. An adjudication that Lawson is not entitled to any relief on its counterclaim, including, without limitation, any fine or damages; and
- C. Costs and such further relief to which IpLearn is entitled, and which the Court deems just and equitable.

DEMAND FOR JURY TRIAL

IpLearn demands a trial by jury on all issues so triable.

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